

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of KCP&L Greater Missouri Operations)
Company's Application for Authority to Establish a) File No. EO-2014-0151
Renewable Energy Standard Rate Adjustment Mechanism)

**APPLICATION TO INTERVENE
OF RENEW MISSOURI**

COMES NOW Earth Island Institute d/b/a Renew Missouri ("Renew Missouri"), pursuant to 4 CSR 240-2.075 and the Commission's April 30, 2014 Order and Notice, and for its Application to Intervene in the above-styled case, states as follows:

1. Renew Missouri is a project of Earth Island Institute, a not-for-profit corporation organized under the laws of California. Renew Missouri is a registered fictitious name of Earth Island Institute under Section 417.200, RSMo. Earth Island Institute has a Certificate of Authority for a Foreign Nonprofit granted by the Missouri Secretary of State.

2. Renew Missouri was instrumental in the passage of Proposition C, or the Missouri Renewable Energy Standard ("RES"). Renew Missouri also participated in the RES rulemaking process. Renew Missouri has an interest in the full implementation and enforcement of the RES in that the organization's mission includes the promotion of renewable energy in Missouri. Additionally, Renew Missouri was a party to Case No. ET-2014-0059 and has an interest in the continuation of the issues discussed therein.

3. Renew Missouri's interest is different than that of the general public and may be adversely affected by a final order arising from this case.

4. Good cause exists to grant Renew Missouri late intervention. Renew Missouri has a unique perspective that is not yet been represented in this case. Granting Renew Missouri leave to late intervene in this case will serve the public interest by assisting the Commission's record for decision in this case.

5. No party will be adversely affected by such intervention.

WHEREFORE, Renew Missouri requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully Submitted,

/s/ Andrew J. Linhares

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ATTORNEY FOR EARTH ISLAND
INSTITUTE d/b/a RENEW MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 6th day of May, 2014.

/s/ Andrew J. Linhares

Andrew J Linhares, # 63973